

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

OHIO CASUALTY)	
INSURANCE COMPANY,)	
)	
Plaintiff,)	
v.)	CIVIL ACTION NO. 3:06CV977-MEF
)	
MANIFOLD CONSTRUCTION,)	
LLC, et al.,)	
)	
Defendants.)	

**INTERROGATORIES AND
REQUESTS FOR PRODUCTION
TO DEFENDANTS**

Comes now the Plaintiff and propounds the following to each Defendant *separately* and *severally*. All requested documents are to be produced at the office of counsel for the Plaintiff.

1. State your full name.
2. Produce all documents, tangible things and electronically stored information (including e-mail) reflecting or referable to communications between any of the following:
 - (a) the Defendants herein individually or through their representatives or attorneys;
 - (b) the attorneys for the Defendants herein regarding insurance, Sanders

Creek Subdivision, the underlying lawsuit, and/or settlement;

- (c) the Plaintiff and any Defendant hereto (including but expressly *not* limited to all cancellation and other notices relating to insurance policies);
- (d) any Defendant herein and the Plaintiff;
- (e) any Defendant herein and Aronov Insurance Incorporated;
- (f) All exhibits and demonstrative aids or evidence utilized by either Defendant in the trial of the underlying lawsuit.

3. With regard to the jury verdict entered in Case No. CV-of-137, Circuit Court of Lee County, Alabama (referred to as “the Underlying Lawsuit”):

- (a) state the amount, if any, awarded by the jury for economic loss.
 - (a1) Describe in detail how you calculated that amount.
 - (a2) Produce all documents supporting that calculation.
- (b) state the amount, if any, awarded by the jury for bodily injury.
 - (b1) Describe in detail how you calculated that amount.
 - (b2) Produce all documents supporting that calculation.
- (c) state the amount, if any, awarded by the jury for property damage.
 - (c1) Describe in detail how you calculated that amount.
 - (c2) Produce all documents supporting that calculation.
- (d) state the amount, if any, awarded by the jury for any other elements of

damage.

(d1) State the element of damage.

(d2) Describe in detail how you calculated the amount.

(d3) Produce all documents supporting that calculation.

4. Separately and severally with regard to each of your affirmative defenses or counterclaims:

(a) state each fact on which it is based in chronological order;

(b) produce all documents, tangible things and electronically stored information which you contend supports those allegations.

/s/ Christopher Lyle McIlwain, Sr.

Christopher Lyle McIlwain, Sr.

MCIL 3043

Attorney for Plaintiff

Ohio Casualty Insurance Company

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on _____, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties, and I hereby certify that, to the best of my knowledge and belief, there are no non-CM/ECF participants to whom the foregoing is due to be mailed by way of the United States Postal Service.

s/ Christopher Lyle McSwain, Sr.